

m/027/007

From: Doug Jensen
To: Wayne Hedberg
Date: Thu, Sep 16, 1999 11:56 AM
Subject: Comments of BLM's Finding of No Significant Impact & EA for Drum Mine

Wayne:

These are the items I feel need comment.

Stipulation Section of FONSI — Comment #5 States that "No waste oils or other petroleum products shall be disposed of on project area"

The EA states three separate times that — Hydrocarbon contaminated soils would be placed on waste dump W1 for evaporation and naturally occurring bio-remediation, which is the case? If this material is placed on the dump it will need to be blended with soils as there will not be sufficient time for natural remediation.

In Chapter II under proposed actions:

Facilities-- the EA states " the sediment in the ponds would be covered with a bentonite clay and then covered with fill material prior to the placement of soil and seeding." If there wasn't an issue with the pond sediments initially, why is there a need to seal off the area. The clays used for containment below the secondary liners normally have to be at least a 10 -7 perk rate, I feel that would be sufficient to seal off the area, if this really is a problem.

Growth Medium Replacement: " All spreading operations would be conducted on the contour to minimize erosion" sounds good in theory not to practical in the field. Soils normally are placed pushing counter-contour then ripped on contour if erosion is a concern.

Revegetation and Stabilization: " Final finished seedbed would be "dimpled", thus minimizing erosion." Dimpling will provide micro horizons for seeding but don't do much to stop erosion, I would rather rip lightly on contour. This would provide both a seedbed horizon and a tie between the soil cap and the heap material.

Proposed Action: Water Quality section — states that sediment in the bottom of the process water ponds were sampled during a testing program and Utah Division of Water Quality has determined that the results of the analysis indicate that there is little danger of degradation of water quality from any of these features — Then why do we need a bentonite cap?

I am also concerned that in the "Interdisciplinary Team Checklist" portion of the EA. --- P. Fosse stated that "If noxious weeds infest the reclaimed area, applicant should be responsible to control them to BLM's satisfaction." If the BLM protocol is followed and the equipment is washed down before and after, I'm not sure we will be able to get WSMC to revisit the site due to a weed infestation.